

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ERIE

Index No.: _____/19

-----X
HOWARD C. ZWELLING, III,Plaintiffs designate
ERIE COUNTY
as place of trial.

Plaintiff,

-against -

The basis of venue is
Defendants principal place
of business.DIOCESE OF BUFFALO, ST. JAMES ROMAN
CATHOLIC CHURCH, AND ST. MARY'S ON THE
HILL,Plaintiff's residence
address is
10560 Alleghany Road
Darien Center, NY 14040

Defendant(s).

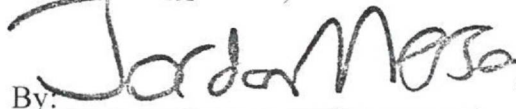
SUMMONS-----X
To the above-named defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case your failure to appear or answer, judgement will be taken for the relief demanded herein.

A COPY OF THIS SUMMONS WAS FILED WITH THE CLERK OF THE COURT, ERIE COUNTY ON _____ IN COMPLIANCE WITH CPLR §§305(a) AND 306(a).

Dated: New York, New York
August 16, 2019

MERSON LAW, PLLC

By: Jordan K. Merson
Attorneys for Plaintiff
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

TO:

DIOCESE OF BUFFALO

795 Main Street
Buffalo, NY 14203

ST. JAMES ROMAN CATHOLIC CHURCH

c/o Diocese of Buffalo
795 Main Street
Buffalo, NY 14203

ST. MARY'S ON THE HILL

c/o Diocese of Buffalo
795 Main Street
Buffalo, NY 14203

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ERIE

Index No.: _____/19

-----X
HOWARD C. ZWELLING, III,

Plaintiff,

-against -

**VERIFIED
COMPLAINT**DIOCESE OF BUFFALO, ST. JAMES ROMAN
CATHOLIC CHURCH, AND ST. MARY'S ON THE
HILL,

Defendant(s).

-----X
Plaintiff(s), above named, complaining of the defendants, by **MERSON LAW,**

PLLC., respectfully allege(s):

NATURE OF THE CLAIM

1. This is a case of plaintiff Howard C. Zwelling, III who was sexually abused as a child by Father Gerald Jasinski ("Jasinski") at and of St. James Roman Catholic Church (collectively referred to herein as "St. James"), and Oblates of St. Mary's on the Hill ("St. Mary's") and Diocese of Buffalo ("Diocese").
2. Jasinski was an agent, servant and/or employee of the Diocese, St. James, and St. Mary's. Jasinski was known among the community and the children as a sexual predator.
3. Despite the Diocese, St. James, and St. Mary's knowledge that Jasinski sexually abused children and/or had the propensity to sexually abuse children, the Diocese, St. James and St. Mary's allowed Jasinski the unfettered access to children, including on Defendants' premises and property without supervision.

4. In approximately 1978 and continuing until 1979, Jasinski, while under the scope of employment with the Diocese, St. James, and St. Mary's and while acting on behalf of the Diocese, St. James and St. Mary's, would sexually abuse Plaintiff, then approximately between fifteen and sixteen years old, by inviting Plaintiff into his apartment at the rectories of St. James and St. Mary's, and giving him alcohol and/or threaten plaintiff so Jasinski could perform oral sex on plaintiff and have plaintiff perform it on Jasinski, and otherwise sexually abuse him.
5. The sexual abuse occurred in at St. James and St. Mary's rectories.
6. Plaintiff brings this lawsuit to recover for the emotional and physical suffering he endured because of the negligence of the Diocese of Buffalo, St. James Roman Catholic Church and t. Mary's on the Hill Church and to make sure no other child is forced to suffer the abuse and physical and mental trauma he felt and continues to feel.

PARTIES

7. At all times herein mentioned defendant **DIOCESE OF BUFFALO** was a not for profit corporation incorporated in the state of New York and by virtue of the laws of the State of New York.
8. At all times herein mentioned, defendant **DIOCESE OF BUFFALO** was located at 795 Main Street, Buffalo, New York 14203..
9. At all times herein mentioned, Jasinski was an agent, servant and/or employee operating under the direction and control of defendant **DIOCESE OF BUFFALO**, and its agents, servants and/or employees.
10. At all times herein mentioned defendant **ST. JAMES ROMAN CATHOLIC CHURCH** was a not for profit domestic corporation.

11. At all times herein mentioned, defendant **ST. JAMES ROMAN CATHOLIC CHURCH** was located at 496 Terrace Boulevard Depew, NY 14043.
12. At all times herein mentioned, Jasinski was an agent, servant and/or employee operating under the direction and control of defendant **ST. JAMES ROMAN CATHOLIC CHURCH**, and its agents, servants and/or employees.
13. At all times herein mentioned **ST. MARY'S ON THE HILL** was a not for profit corporation incorporated in the state of New York and by virtue of the laws of the State of New York.
14. At all times herein mentioned, defendant **ST. MARY'S ON THE HILL** was located at 1 St. Mary's Hill Lancaster, NY 14086.
15. At all times herein mentioned, Jasinski was an agent, servant and/or employee operating under the direction and control of defendant **ST. MARY'S ON THE HILL**, and its agents, servants and/or employees.
16. At all times herein mentioned, defendants **DIOCESE OF BUFFALO, ST. JAMES ROMAN CATHOLIC CHURCH** and **ST. MARY'S ON THE HILL** were agents, servants, employees and/or alter egos of each other.

FACTS OF THE CASE

17. Defendants **DIOCESE OF BUFFALO, ST. JAMES ROMAN CATHOLIC CHURCH** and **ST. MARY'S ON THE HILL** negligence and recklessness caused Jasinski to have access to children, including on Diocese, St. James and St. Mary's property without proper supervision, despite their knowledge that Jasinski sexually abused children and/or had the propensity to sexually abuse children and therefore are responsible for the injuries that Plaintiff incurred because but for Defendants

DIOCESE OF BUFFALO, ST. JAMES ROMAN CATHOLIC CHURCH and **ST. MARY'S ON THE HILL** negligence, Plaintiff would not have suffered the mental and physical anguish inflicted by Jasinski. Defendants' gross negligence, reckless, wanton, and/or willful conduct supports punitive liability.

18. Jasinski sexually assaulted Plaintiff and other children at a cabin in Popular Point in Sheldon in Wyoming County. Nonetheless, defendant **DIOCESE OF BUFFALO**, defendant **ST. JAMES ROMAN CATHOLIC CHURCH** and/or defendant **ST. MARY'S ON THE HILL** failed to remove Jasinski from his position or to take any steps to keep the dangerous predator away from children. In fact, the Diocese, St. James and St. Mary's continued to allow, encourage and/or permit Jasinski to have unfettered access to children, on Defendant's premises without proper supervision.
19. Father Jasinski befriended Plaintiff a homeless child at the time and convinced Father Joe who was the head of the Church at the time to stay since he had nowhere else to go.
20. In approximately 1978 and continuing through approximately 1979, Jasinski would sexually abuse Plaintiff repeatedly.
21. Jasinski would force Plaintiff to drink alcohol and perform sexual acts on him.
22. Jasinski used the power and authority provided to him by the Diocese, St. James and St. Mary's to repeatedly sexually abuse Plaintiff all while acting under the scope of employment with the Diocese, St. James and St. Mary's.
23. As a result of the actions of Jasinski, Plaintiff felt and continues to feel ashamed and uncomfortable.
24. As such, Plaintiff suffered catastrophic and lifelong injuries as a result of defendant **DIOCESE OF BUFFALO**, defendant **ST. JAMES ROMAN CATHOLIC**

CHURCH and/or defendant **ST. MARY'S ON THE HILL's** negligence in undertaking a duty, including but not limited to in locis parentis, in failing to protect the children of its parishes and of its community safe from Jasinski despite the Diocese, St. James and/or St. Mary's having knowledge that Jasinski abused and/or sexually abused children and/or had the propensity to abuse and/or sexually abuse children, and/or allowing Jasinski to continue to have his position of authority and power, with unfettered access to children, as well as the diocese failed to adequately supervise Jasinski.

AS AND FOR A FIRST CAUSE OF ACTION FOR NEGLIGENCE

AS TO THE DIOCESE OF BUFFALO

25. Plaintiffs repeat, reiterate and reallege each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 24., inclusive, with the same force and effect as if hereinafter set forth at length.
26. At all times mentioned herein, defendant **DIOCESE OF BUFFALO** owed a duty of care, including but not limited to in locis parentis, to keep the children of the diocese and who were staying on its premises, including plaintiff safe from the abuse and/or sexual abuse by its agents, servants and or employees under its supervision and control, including on company premises, that ultimately befell the plaintiff, and they had a duty to supervise Jasinski.
27. At all times mentioned herein, defendant **DIOCESE OF BUFFALO** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.

28. As a result of the negligence of defendant **DIOCESE OF BUFFALO** and/or its agents, servants and/or employees, plaintiff was caused serious personal injuries, emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
29. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
30. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
31. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
32. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A SECOND CAUSE OF ACTION FOR NEGLIGENCE

AS TO OBLATES OF ST. JAMES ROMAN CATHOLIC CHURCH

33. Plaintiffs repeat, reiterate and reallege each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 32., inclusive, with the same force and effect as if hereinafter set forth at length.
34. At all times mentioned herein, defendant **ST. JAMES ROMAN CATHOLIC CHURCH** owed a duty of care, including but not limited to in locis parentis, to keep the children of the diocese and who were staying on its premises, including plaintiff safe from the abuse and/or sexual abuse by its agents, servants and or employees under its supervision and control, including on company premises, that ultimately befell the plaintiff, and they had a duty to supervise Jasinski.

35. At all times mentioned herein, defendant **ST. JAMES ROMAN CATHOLIC CHURCH** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.
36. As a result of the negligence of defendant **ST. JAMES ROMAN CATHOLIC CHURCH** and/or its agents, servants and/or employees, plaintiff was caused serious personal injuries, emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
37. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
38. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
39. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
40. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A THIRD CAUSE OF ACTION FOR NEGLIGENCE

AS TO ST. MARY'S ON THE HILL

41. Plaintiffs repeat, reiterate and reallege each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 40., inclusive, with the same force and effect as if hereinafter set forth at length.
42. At all times mentioned herein, defendant **ST. MARY'S ON THE HILL** owed a duty of care, including but not limited to in locis parentis, to keep the children of the diocese and

who were staying on its premises, including plaintiff safe from the abuse and/or sexual abuse by its agents, servants and or employees under its supervision and control that ultimately befell the plaintiff, and they had a duty to supervise Jasinski.

43. At all times mentioned herein, defendant **ST. MARY'S ON THE HILL** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.
44. As a result of the negligence of defendant **ST. MARY'S ON THE HILL** and/or its agents, servants and/or employees, plaintiff was caused serious personal injuries, emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
45. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
46. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
47. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
48. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A FOURTH CAUSE OF ACTION FOR NEGLIGENT HIRING,

RETENTION AND SUPERVISION AS TO DIOCESE OF BUFFALO

49. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 48., inclusive, with the same force and effect as if hereinafter set forth at length.

50. Defendant **DIOCESE OF BUFFALO** had a duty to supervise and prevent known risks of harm to the children by its agents, servants and/or employees.
51. Defendant was negligent in hiring, retaining and supervising their personnel, such as Jasinski, who was careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge and skill of school officials and other home and school supervisors who should have properly been supervising the agents, servants and/or employees and church officials to ensure the safety of the children of its school.
52. Defendant **DIOCESE OF BUFFALO** knew or should have known Jasinski sexually abused and/or had the propensity to sexually abuse children and did nothing to stop it, and failed to supervise Jasinski.
53. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
54. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
55. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
56. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
57. This action falls within exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FIFTH CAUSE OF ACTION FOR NEGLIGENT HIRING,
RETENTION AND SUPERVISION AS TO ST. JAMES ROMAN CATHOLIC
CHURCH**

58. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. Through 57., inclusive, with the same force and effect as if hereinafter set forth at length.
59. Defendant **ST. JAMES ROMAN CATHOLIC CHURCH** had a duty to supervise and prevent known risks of harm to the children by its agents, servants and/or employees.
60. Defendant was negligent in hiring, retaining and supervising their personnel, such as Jasinski, who was careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge and skill of school officials and other home and school supervisors who should have properly been supervising the agents, servants and/or employees and church officials to ensure the safety of the children of its school.
61. Defendant **ST. JAMES ROMAN CATHOLIC CHURCH** knew or should have known Jasinski sexually abused and/or had the propensity to sexually abuse children and did nothing to stop it, and failed to supervise Jasinski.
62. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
63. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.

64. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
65. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
66. This action falls within exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SIXTH CAUSE OF ACTION FOR NEGLIGENT HIRING,
RETENTION AND SUPERVISION AS TO ST. MARY'S ON THE HILL**

67. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 66., inclusive, with the same force and effect as if hereinafter set forth at length.
68. Defendant **ST. MARY'S ON THE HILL** had a duty to supervise and prevent known risks of harm to the children by its agents, servants and/or employees.
69. Defendant was negligent in hiring, retaining and supervising their personnel, such as Jasinski, who was careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge and skill of school officials and other home and school supervisors who should have properly been supervising the agents, servants and/or employees and church officials to ensure the safety of the children of its school.
70. Defendant **ST. MARY'S ON THE HILL** knew or should have known Jasinski sexually abused and/or had the propensity to sexually abuse children and did nothing to stop it, and failed to supervise Jasinski.
71. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental

anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.

72. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
73. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
74. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
75. This action falls within exceptions to Article 16 of the C.P.L.R.

**AS AND FOR THE SEVENTH CAUSE OF ACTION FOR NEGLIGENT
INFLECTION OF EMOTIONAL DISTRESS AS TO DIOCESE OF BUFFALO**

76. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 75., inclusive, with the same force and effect as if herein set forth at length.
77. Defendant **DIOCESE OF BUFFALO** and its agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire Jasinski, the agent, servant and/or employee who sexually abused Plaintiff, would and did proximately result in physical and emotional distress to Plaintiff.
78. Defendant **DIOCESE OF BUFFALO** and their agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.
79. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by Jasinski.

80. Despite said knowledge, power and duty, defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted in the Jasinski sexually abusing Plaintiff.
81. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
82. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
83. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
84. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR THE EIGHTH CAUSE OF ACTION FOR NEGLIGENT INFLICTION
OF EMOTIONAL DISTRESS AS TO ST. JAMES ROMAN CATHOLIC CHURCH

85. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 84., inclusive, with the same force and effect as if herein set forth at length.
86. Defendant **ST. JAMES ROMAN CATHOLIC CHURCH** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire Jasinski, the agent, servant and/or employee who sexually abused Plaintiff, would and did proximately result in physical and emotional distress to Plaintiff.
87. Defendant **ST. JAMES ROMAN CATHOLIC CHURCH** and their agents, servants and/or employees knew or reasonably should have known that the sexual abuse and

other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.

88. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by Jasinski.
89. Despite said knowledge, power and duty, defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted in the Jasinski sexually abusing Plaintiff.
90. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
91. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
92. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
93. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR THE NINTH CAUSE OF ACTION FOR NEGLIGENT INFLICTION
OF EMOTIONAL DISTRESS AS TO ST. MARY'S ON THE HILL

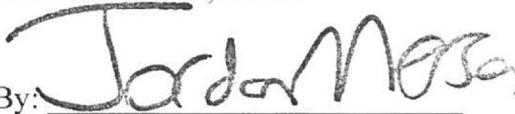
94. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 93., inclusive, with the same force and effect as if herein set forth at length.
95. Defendant **ST. MARY'S ON THE HILL** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire Jasinski, the agent, servant and/or employee who sexually abused Plaintiff, would and did proximately result in physical and emotional distress to Plaintiff.

96. Defendant **ST. MARY'S ON THE HILL** and their agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.
97. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by Jasinski.
98. Despite said knowledge, power and duty, defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted in the Jasinski sexually abusing Plaintiff.
99. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
100. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
101. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
102. This action falls within exceptions to Article 16 of the C.P.L.R.

WHEREFORE, plaintiff demands judgement against defendants in such sum as a jury would find fair, adequate and just.

Dated: New York, New York
August 16, 2019

MERSON LAW, PLLC

By: 

Jordan K. Merson
Sarah R. Cantos
Attorneys for Plaintiff
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ERIEIndex No.:
_____/19-----X
HOWARD C. ZWELLING, III

Plaintiff,

-against -

ATTORNEY
VERIFICATIONDIOCESE OF BUFFALO, ST. JAMES ROMAN
CATHOLIC CHURCH, AND ST. MARY'S ON THE
HILL,

Defendants.

-----X
JORDAN K. MERSON, an attorney duly admitted to practice in the Courts of New York
State, and a member of the firm MERSON LAW, PLLC., attorneys for the plaintiffs in
the within action, hereby affirms under penalty of perjury:

That he has read the within complaint and knows the contents thereof, and that the
same is true to his own knowledge, except as to the matters therein stated to be alleged upon
information and belief, and that as to those matters he believes it to be true.

That the sources of his information and knowledge are investigations and records in
the file.

That the reason this verification is made by affirmant and not by the plaintiff is that
the plaintiff is not within the County where the attorney has his office.

Dated: New York, New York
August 16, 2019


JORDAN K. MERSON

Index No.

Year 2016

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

HOWARD C. ZWELLING, III.,

Plaintiff(s),

- against -

DIOCESE OF BUFFALO, ST. JAMES ROMAN
CATHOLIC CHURCH, and ST. MARY'S ON THE
HILL,

Defendant(s),

SUMMONS AND COMPLAINT

Merson Law, PLLC.

Attorneys for Plaintiff(s)

Office and Post Office Address, Telephone

150 East 58th Street 34th Fl.
New York, New York 10155
(212) 603-9100

To: All Parties
